



**U.S. Department of Justice**

*United States Attorney  
District of New Jersey*

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May 8, 2020

**Filed Via ECF**

The Honorable Claire C. Cecchi  
United States District Judge  
Martin Luther King Jr. Federal Building and U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: United States v. Matthew Brent Goetsche, et al.,  
Crim. No. 19-877

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Your Honor:

The United States of America, through the undersigned, respectfully requests that the Court enter the proposed complex case order and continuance order to extend the Speedy Trial Act deadlines through July 15, 2020.

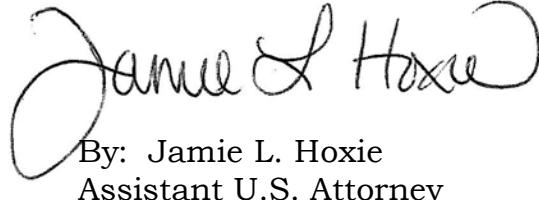
As discussed during the Court's May 6, 2020 status teleconference, the Government has provided defense counsel with substantial discovery, including well over 500,000 electronic records and a copy of the BitClub Network servers that were recovered in the investigation. The Government anticipates making another production of approximately 200,000 electronic records in the next few days. In addition, the parties continue to work through a process designed to reasonably protect the defendants' attorney-client privilege (the "Filter Process,") which the Government does not expect will be complete until July 15, 2020, at the earliest.

Under these circumstances, it will not be possible for trial to proceed prior to July 15, 2020 because the parties will still be completing the exchange and review of Rule 16 discovery. Accordingly, the Government submits that, given the complexity of the discovery in this case and the Filter Process, a continuance of the Speedy Trial deadlines through July 15, 2020 is necessary and appropriate.

Accordingly, the Government respectfully requests that the Court enter the proposed complex case and continuance order.

Respectfully submitted,

CRAIG CARPENITO  
United States Attorney



A handwritten signature in black ink, appearing to read "Jamie L. Hoxie".

By: Jamie L. Hoxie  
Assistant U.S. Attorney